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June 29, 1998

VIA FEDERAL EXPRESS

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, DC 20554

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Dear Ms. Salas:

**Re: CCD No. 92-237; In the Matter of the North American Numbering Plan,
Carrier Identification Codes (CICs)**

Enclosed for filing in the above captioned matter are an original and four (4) copies of a Petition of Jordan-Soldier Valley Cooperative Telephone Company for Extension of Time Granted in Prior Waiver. We trust that the enclosed will be found in order for filing and grant. We have also enclosed one copy to be stamped and returned in the enclosed self-addressed stamped envelope.

Should you require any further information, or have any questions regarding this filing, please call me at (719) 594-5828.

Sincerely,

Leslie Christina Pilgrim

Leslie Christina Pilgrim
Consultant

Enclosures

cc: Service List

No. of Copies rec'd 025
List A B C D E

GVNW INC./MANAGEMENT

2270 La Montana Way (80918) P.O. Box 25969 (80936) Colorado Springs, CO (719) 594-5800 FAX: (719) 599-0968

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Administration of the
North American Numbering Plan,
Carrier Identification Codes (CICs)

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CC Docket No. 92-237

**PETITION OF JORDAN-SOLDIER VALLEY COOPERATIVE TELEPHONE
COMPANY FOR EXTENSION OF TIME GRANTED IN PRIOR WAIVER**

I. Introduction

Jordan-Soldier Valley Cooperative Telephone Company, (hereafter "Jordan-Soldier "), by its consultant, and pursuant to the Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, CC Docket No. 92-237, (hereafter "the Order"), hereby requests an extension of its temporary waiver of the requirement that all Local Exchange Carriers ("LECs") that are equal access complete upgrades to their switches to recognize four digit CICs by January 1, 1998.

In the Order, the FCC reaffirmed its requirement that LECs that provide equal access must convert their switches to accept four digit CICs by January 1, 1998. The FCC also extended the permissive period to June 30, 1998 during which three and four digit CICs would continue to be accepted.

In compliance with paragraph 24 of the FCC's Order on Reconsideration, Jordan-Soldier sought relief of the FCC's conversion deadline of January 1, 1998, and was granted a waiver

until June 30, 1998.¹ Due to a transitional problem, as a result of being acquired, Jordan-Soldier will not be able to comply with the June 30, 1998 deadline. Jordan-Soldier will identify these special circumstances that warrant a deviation from the Order and show that an extension of the waiver will serve the public interest. Also, Jordan-Soldier will show good cause that a waiver of the Commission's Order is necessary and appropriate as well as in the public interest.

II. Background

Jordan-Soldier Valley Cooperative Telephone Company serves one exchange, Soldier, which provisions services for approximately 337 access lines, one payphone and no hotel/motel lines. The exchange is currently served by a Nortel DMS 10 with the software generic 208.32. This switch was installed June of 1983.

Jordan-Soldier started the process for an interconnection agreement with a neighboring local exchange company to act as a host switch for various features and functions to include the capability of the 4-digit CIC. Jordan-Soldier anticipated that the interconnection would be operational by June 30, 1998. Jordan-Soldier then determined that a switch replacement was an operational necessity.

III. A Waiver of the Commission Rules is Necessary and in the Public Interest

In order to comply with the FCC's order, Jordan-Soldier requires, at minimum, an upgrade to the switch to the latest generic software level. The current software generic cannot accommodate these requirements due to the translations fields that contain the CIC/CAC codes not being long enough to accept four digit codes. In order to accommodate the four digit CIC

¹ *Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule*, NSD File Nos. 97-74; 97-63; 97-78; 97-75; 97-66; 97-67; 97-65; 97-68; 97-73; 97-70 ;97-72; 97-76; 97-64; 97-71; 97-69, Order, DA 97-2691, rel. December 24, 1997.

and seven digit CAC, the translation fields require an expansion. The expansion of the fields is reliant upon an outside vendor(s) to rewrite the generic software. Another solution for Jordan-Soldier is to buy a switch with a software generic containing the expanded translation fields. Jordan-Soldier 's current switch was installed prior to the industry addressing the expansion from a three-digit CIC to a four-digit CIC. In order to comply with the CIC/CAC requirements, it is an operational necessity for Jordan-Soldier to either replace the switch or upgrade the software generic.

Since its original waiver, Jordan-Soldier has been acquired by another company. The acquiring company affirms that the original plan to replace the current switch and establish a host-remote configuration is to be implemented. Implementation has been slowed due to the project being overlooked in the transition.

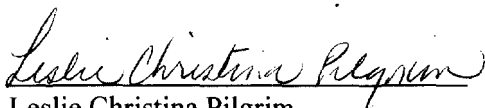
The new company management has been actively engaged in resolving this issue and has taken immediate action to acquire a used switch. As most small companies find when acquiring a switch, new or used, it also requires a team of technicians to physically connect and test the components before turning it over to the company. Jordan-Soldier has arranged for the acquisition of a switch. However, an installation team has not been secured to install the switch. Preliminary discussions with one of the two vendors that Jordan-Soldier is working with indicate that the switch could be installed and operational by August 31, 1998. As of the date of this filing, a date has not been confirmed to complete installation. However, Jordan-Soldier is working diligently with the vendors to ensure that the switch can be installed and operational no later than August 31, 1998.

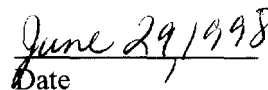
Jordan-Soldier believes that by granting this waiver the impact to its customers will be minimal. Jordan-Soldier is making a concerted effort to comply with all of the FCC

requirements and meet its customer needs. It is taking the necessary steps to ensure that the regulatory requirements and customer needs will be met. Jordan-Soldier submits that grant of this petition will serve in the best interest of the public. Based on the aforementioned information, Jordan-Soldier requests that an extension be granted until August 31, 1998.

Conclusion

Jordan-Soldier is actively pursuing a remedy to meet the FCC's requirement. Grant of this petition for extension will serve the public interest and will allow Jordan-Soldier to complete its switch replacement and meet the FCC's CIC/CAC requirements. Jordan-Soldier submits that the public interest will be better served by an extension of the waiver and that grant of this petition would be consistent with the policies underlying these rules. Good cause having been shown, Jordan-Soldier Valley Cooperative Telephone Company respectfully requests the Commission grant the petition.


Leslie Christina Pilgrim
Consultant, GVNW Inc./Management


Date

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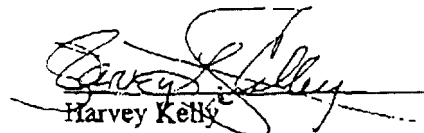
AFFIDAVIT

STATE OF SOUTH DAKOTA)

COUNTY OF DAVISON)


Harvey Kelly^e, Engineering Consultant to Jordan-Soldier Valley Cooperative
Telephone Company, first being duly sworn, on his oath states:

1. that he has participated in the preparation of the foregoing petition,
2. that he deems it an operational necessity to replace the current switch or to upgrade the software generic,
3. that for reasons stated therein deem it is in the public's best interest to replace the switch in order to comply with the FCC's mandate,
4. and that the information contained therein are true to the best of his knowledge and belief.


Harvey Kelly
Engineering Consultant

Subscribed and sworn to before me this 26th day of

June 1998.


DeAnna M. Schmidt
Notary Public

My commission expires

8/28/2003